



Eric Gonzalez
District Attorney

**DISTRICT ATTORNEY
KINGS COUNTY**

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ADRIELE DOUGLAS
Assistant District Attorney

September 8, 2020

Re: [REDACTED]

In connection with the above-named case, the People voluntarily provide the following information regarding:

MOS NAME: Paul Pierre

MOS TAX: 935513

in satisfaction (to the extent applicable) of their constitutional, statutory, and ethical obligations. Further, the People reserve the right to move in limine to preclude reference to this information, or otherwise to object to its use and/or introduction into evidence.

Disclosure # 1:

MOS WAS ADJUDICATED GUILTY OF AND ENTERED A PLEA OF GUILTY TO THE FOLLOWING DEPARTMENT CHARGES ARISING OUT OF AN INCIDENT ON 02/02/2009:

1. MOS, WHILE ASSIGNED TO THE TRANSIT BUREAU DISTRICT #34, ON DUTY, AND ASSIGNED TO PATROL, FAILED TO PERFORM MOS'S DUTIES AS DIRECTED AND WAS OFF POST, TO WIT: SAID MOS WAS SCHEDULED TO BE ON A DIRECTED PATROL FROM 0300 HOURS TO 0345 HOURS AT A LOCATION KNOWN TO THE DEPARTMENT, BUT WAS OBSERVED SLEEPING AT APPROXIMATELY 0310 HOURS UNTIL 0315 HOURS, IN A LOCATION KNOWN TO THE DEPARTMENT.
1. MOS, WHILE ASSIGNED TO THE TRANSIT BUREAU DISTRICT #34, ON DUTY, AND ASSIGNED TO PATROL, WRONGFULLY NEGLECTED TO MAKE APPROPRIATE ACTIVITY LOG ENTRIES, AS REQUIRED.
2. MOS, WHILE ASSIGNED TO THE TRANSIT BUREAU DISTRICT #34, ON DUTY, AND ASSIGNED TO PATROL, ENGAGED IN CONDUCT PREJUDICIAL TO THE GOOD ORDER, EFFICIENCY OR DISCIPLINE OF THE DEPARTMENT IN THAT SAID MOS WAS OBSERVED SLEEPING IN SAID MOS'S ASSIGNED VEHICLE.

CASE STATUS: CLOSED ON 02/12/2013.

PENALTY: FORFEIT THIRTY (30) VACATION DAYS. THIS PENALTY WAS SHARED WITH THE PENALTY FOR DISCLOSURE # 2.

Disclosure # 2:

MOS WAS ADJUDICATED GUILTY AFTER TRIAL OF THE FOLLOWING DEPARTMENT CHARGES ARISING OUT OF AN INCIDENT ON OR ABOUT 11/14/2010:

1. MOS, WHILE ON DUTY AND ASSIGNED TO TRANSIT DISTRICT 34, WAS OFF POST WITHOUT PERMISSION OR POLICE NECESSITY.
2. MOS, WHILE ON DUTY AND ASSIGNED TO TRANSIT DISTRICT 34, FAILED TO MAKE APPROPRIATE ENTRIES THAT SAID MOS CLAIMED TO HAVE PERFORMED IN THE DEPARTMENT ISSUED ACTIVITY LOG.

CASE STATUS: CLOSED ON 02/12/2013.

PENALTY: FORFEIT THIRTY (30) VACATION DAYS. THIS PENALTY WAS SHARED WITH THE PENALTY FOR DISCLOSURE # 1.

Disclosure # 3:

NYPD SUBSTANTIATED THE FOLLOWING ALLEGATIONS AGAINST MOS ARISING FROM 08/17/2012:

1. OTHER DEPARTMENT RULES-PROCEDURES/FAIL TO NOTIFY IAB

CASE STATUS: CLOSED ON 01/01/2014.

Disclosure # 4:

NYPD SUBSTANTIATED THE FOLLOWING ALLEGATION AGAINST MOS ARISING FROM 06/19/2017:

1. FAIL TO PREPARE REPORT – CITY INVOLVED ACCIDENT REPORT

CASE STATUS: CLOSED ON 10/12/2017.

PENALTY: A CD ISSUED.

THE PEOPLE ARE UNAWARE OF ANY PENDING OR SUBSTANTIATED CCRB ALLEGATIONS AGAINST THIS MOS.

Eric Gonzalez
District Attorney
Kings County